

Thank you for your comment, Richard Bowman.

The comment tracking number that has been assigned to your comment is GLMRIS50606.

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GLMRIS

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Attachment: 2011.03.31.GLMRIS NEPA Comment from TNC.pdf

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March 31, 2011

Colonel Vincent V. Quarles
Chicago District Commander
US Army Corps of Engineers
111 N. Canal Street, Suite 600
Chicago, IL 60606

RE: Great Lakes and Mississippi River Interbasin Study Scoping

Dear Commander Quarles:

On behalf of The Nature Conservancy's Great Lakes Project*, representing the eight Great Lakes States Chapters and The Nature Conservancy of Canada, thank you for the opportunity to comment on the Great Lakes and Mississippi River Interbasin Study (GLMRIS). We recognize that you and your staff will encounter many challenges as you undertake such a geographically large and multifaceted feasibility study. This is an exercise to identify a long-term solution to Aquatic Nuisance Species transfer between these two great watersheds, not simply an emergency fix to the Asian carp crisis. We offer several observations and recommendations in the spirit of supporting and advancing this important study.

After reviewing the November 2010 GLMRIS Project Management Plan, we appreciate that your staff has developed a schedule designed to compresses the study timeframe by working on multiple studies and processes simultaneously, sharing intermediate products, and all the while complying with NEPA and all other applicable laws, regulations and executive orders. Immediate initiation of the Focus Area 1- Chicago Area Waterway System study is also appreciated given this linkage poses the most immediate and critical threat. Focusing on the connection of highest risk first, the Chicago Ship and Sanitary Canal, is a prudent course of action. If there is a way to further compress the timeline, of course, we would be supportive.

We believe that effective ecological separation is vital to the long-term health and restoration of the Great Lakes and Mississippi River basins and that it should be put in place as soon as feasible. Effective ecological separation means eliminating the opportunities for two-way transfer of organisms between the basins by way of the waterway. Measures such as the electric dispersal barriers address only fish of a certain size or greater, yet does not eliminate the movement of other macro-organisms (vertebrates, insects, mollusk, plankton, and all their life stages, including eggs and larvae) or micro-organisms (bacteria and virus) that meet the definition of Aquatic Nuisance Species (ANS) in the Nonindigenous Aquatic Nuisance Prevention and Control Act of 1990. While this definition is

specifically referenced in the scope of work on page #1 of the GLMRIS Project Management Plan, it bears repeating. Recommended alternatives must prevent the movement of all organisms in either direction.

In accordance with the study authorization, USACE will evaluate a range of options and technologies to prevent the transfer of ANS between the Great Lakes and Mississippi River by aquatic pathways. Is the Corps limited to evaluating water resource and development issues related to ANS controls and pathways? A robust feasibility study should explore non-aquatic components or solutions as well, such as intermodal transportation. In that spirit we urge you to utilize results from other credible studies and sources such as the Great Lakes Commission and Great Lakes Cities Initiative sponsored Chicago Area Waterways study.

Thank you in advance for your consideration, and please do not hesitate to contact me at (517)-316-2267 or Rich_Bowman@TNC.org if I can clarify any of our comments or provide additional information.

Very sincerely,

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and
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